

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

OMNIVISION TECHNOLOGIES, INC.,

Plaintiff and Counterclaim Defendant,

v.

RE SECURED NETWORKS, LLC,

Defendant and Counterclaim Plaintiff.

C.A. No. 24-187-JLH-CJB

JURY TRIAL DEMANDED

STIPULATION AND [PROPOSED] ORDER TO AMEND SCHEDULING ORDER

WHEREAS, on July 31, 2024, the Court entered the initial Scheduling Order (“the Original Scheduling Order”) governing this matter (D.I. 35);

WHEREAS, on October 29, 2024, the Court granted Plaintiff and Counterclaim Defendant OmniVision Technologies, Inc. (“OmniVision”) and Defendant and Counterclaim Plaintiff RE Secured Networks, LLC’s (“RE Secured”; collectively with OmniVision, the “Parties”) request to amend the Original Scheduling Order (D.I. 56; the “First Amended Scheduling Order”);

WHEREAS, the Court held a *Markman* hearing on August 11, 2025 (D.I. 111);

WHEREAS, following the *Markman* hearing, the Parties have continued to meet and confer to attempt to resolve contested claim constructions and discovery disputes, including on September 17, 2025, where the Parties discussed the need to adjust the schedule to allow continued discussions in hopes of further resolution; and

WHEREAS, the Parties agree, subject to the approval of the Court, that certain modifications of the First Amended Scheduling Order are warranted in order for the Parties to resolve issues that may simplify this litigation.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between OmniVision and RE Secured, through their undersigned counsel and subject to the approval of the Court, that the First Amended Scheduling Order (D.I. 56) is amended as follows:

| Event | Current Deadline | New Proposed Deadline |
|--|--------------------------|------------------------------|
| Final Invalidity Contentions | Sep. 24, 2025 | Oct. 1, 2025 |
| Close of Fact Discovery | Oct. 8, 2025 | Nov. 3, 2025 |
| Interim Status Report | Oct. 21, 2025 | Nov. 13, 2025 |
| Opening Expert Reports | Oct. 29, 2025 | Nov. 20, 2025 |
| Rebuttal Expert Reports | Nov. 24, 2025 | Dec. 16, 2025 |
| Reply Expert Reports | Dec. 17, 2025 | Jan. 14, 2026 |
| Close of Expert Discovery | Jan. 23, 2026 | Feb. 6, 2026 |
| Dispositive Motions | Feb. 19, 2026 | Feb. 24, 2026 |
| Answering Briefs regarding Dispositive Motions | Mar. 12, 2026 | Mar. 17, 2026 |
| Reply Briefs regarding Dispositive Motions | Mar. 26, 2026 | Unchanged |
| Hearing regarding Case Dispositive Motions | July 9, 2026, 11:00 a.m. | Unchanged |

All other provisions of the First Amended Scheduling Order and Original Scheduling Order remain unchanged.

Pursuant to Local Rule 16.4, the undersigned counsel hereby certify that a copy of this Joint Stipulation and [Proposed] Order to Amend Scheduling Order has been sent to their respective clients, making the clients aware of this request for an extension of the deadline for completion of discovery.

Dated: September 23, 2025

BENESCH FRIEDLANDER
COPLAN & ARONOFF LLP

/s/ Kristen Healey Cramer

Kristen Healey Cramer (No. 4512)
1313 North Market Street, Suite 1201
Wilmington, DE 19801
(302) 442-7010
kcramer@beneschlaw.com

RICHARDS, LAYTON & FINGER, P.A.

Steven J. Fineman (No. 4025)
Kelly E. Farnan (No. 4395)
Sara M. Metzler (No. 6509)
One Rodney Square
920 N. King Street
Wilmington, DE 19801
(302) 651-7700
fineman@rlf.com
farnan@rlf.com
metzler@rlf.com

*Attorneys for Plaintiff and Counterclaim-
Defendant OmniVision Technologies, Inc.*

YOUNG CONAWAY STARGATT &
TAYLOR, LLP

/s/ Jennifer P. Siew

Anne Shea Gaza (No. 4093)
Pilar G. Kraman (No. 5199)
Jennifer P. Siew (No. 7114)
Rodney Square
1000 North King Street
Wilmington, DE 19801
(302) 571-6600
agaza@ycst.com
pkraman@ycst.com
jsiew@ycst.com

*Attorneys for Defendant and Counterclaim-
Plaintiff RE Secured Networks, LLC*

SO ORDERED this _____ day of September 2025.

The Honorable Christopher J. Burke
United States Magistrate Judge